



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 25, 2020

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **United States v. Michael Hild,**  
19 Cr. 602 (RA)

Dear Judge Abrams:

The Government and counsel for defendant Michael Hild jointly and respectfully write in advance of the April 12, 2021 trial in this matter to propose an agreed-upon schedule governing pre-trial matters. The parties respectfully request that the Court adopt the following proposed schedule:

1. Pre-trial motions due by November 16, 2020;
2. Responses to pre-trial motions due by December 4, 2020;
3. Replies to pre-trial motions due by December 11, 2020;
4. Expert disclosure by all parties and defense notice of any advice of counsel defense or intent to rely on privileged material due by February 15, 2021;
5. The Government's 404(b) notice due by March 1, 2021;
6. The Government's witness list and exhibit list due by March 8, 2021;
7. Motions *in limine*, requests to charge, and voir dire due by March 11, 2021 (previously set by the Court);
8. The Court notes that the Government intends to voluntarily produce *Giglio* and 3500 material by March 15, 2021, subject to an agreement in principle to reasonable authenticity and/or business records stipulations;

Application granted. The Court adopts the parties' proposed schedule.

SO ORDERED.

Ronnie Abrams, U.S.D.J.  
August 25, 2020

9. Defendant shall produce all Rule 16 material in his possession and all Rule 17(c) material in his possession that he may seek to offer or otherwise use at trial;
10. Responses to motions *in limine* due by March 18, 2021 (previously set by the Court);
11. Replies to motions *in limine* due by March 25, 2021 (previously set by the Court);
12. Defendant shall produce witness list, exhibit list (including (a) non-impeachment exhibits to be offered through Government witnesses or otherwise during the Government's case in chief and (b) any exhibits to be offered in the defense case), and Rule 26.2 materials by April 7, 2021.

The parties may file additional motions *in limine* after the dates set forth herein if additional bases for such motions arise subsequent to the respective due dates. In the event that the April 12, 2021 trial date is adjourned, this schedule will be stayed pending the Court's issuance of a revised pretrial schedule.

Respectfully submitted,

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Acting United States Attorney

by: \_\_\_\_\_/s  
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cc: Counsel of Record (by ECF)